

ATTACHMENT 1

COMPLAINT FORM

(for filers who are prisoners without lawyers)

IN THE UNITED STATES DISTRICT COURT
FOR THE Eastern DISTRICT OF Wisconsin
Imminent Danger

(Full name of plaintiff(s))

~~Daniels~~
Teriyaki Ariana Daniels-Wilds Also Known As
Dominique DeWayne Gulley-Fernandez
Doc # 528853

vs

Case Number:

(Full name of defendant(s))

WI Department of Corrections (to be supplied by clerk of court)

Tracy Johnson, ~~Warden~~, ~~Comp. Asst.~~

Troy Hermans, Deputy Warden, Gary Boughton, Warden, Captain
David Gardner, Supervising officer 2, Catherine Morrison,
Offender Classification Specialist, WI Secure Program Facility,

All Defendants and government Institutions are being sued
A. PARTIES in their individual capacities.

1. Plaintiff is a citizen of Wisconsin, and is located at
(State)

1101 South Morrison Dr, Po Box 9900, Boscobel, WI
(Address of prison or jail) 53805

(If more than one plaintiff is filing, use another piece of paper).

2. Defendants Troy Hermans, David Gardner, Tracy Johnson Gary Boughton and Catherine Morrison are all citizens of the State of Wisconsin and work for the Wisconsin Department of Corrections at the Wisconsin Secure Program Facility, in Boscobel, Wisconsin.

Defendants Kevin Kallas and Gary Ankarlo are citizens of the State of Wisconsin and work for the Department of Corrections at the Bureau of Health Services - Mental Health Division in Madison, Wisconsin.

Statement of Claim

- ① I Dominique Gulley/Teriyaki Daniels-Wilds born in New Orleans, Louisiana July 1992, and moved to Milwaukee Wisconsin on July 4, 1997 and went back to Louisiana in 1999 and Chicago, Illinois 2000, 2001 and back to Milwaukee, Wisconsin 2001 according to my family.
- ② I am a 23 year old Multi-racial trans-sexual male-to-female of Nigerian, Australian, Hispanic, French, Louisiana Creole, African-American, Brazilian and Spanish descent.
- ③ I identify as female and have always identified as female since I was eight years old.
- ④ This is my first adult incarceration.
- ⑤ In May 2011, I agreed to a psychological evaluation for diagnostic clarification, and I was misdiagnosed.
- ⑥ I have been hospitalized at a number of treatment centers.

~~addition~~

- ⑦ Rogers Memorial Hospital, St. Aemilians Residential Treatment Center, Charter Hospital, Child Adolescent Treatment Center, Milwaukee Psychiatric Hospital, Mendota Mental Health Institution - Mendota Juvenile Treatment Center, Carmelite, Ladd Lake, Haven House, Serenity Residential Treatment Center and St. Charles Youth and Family Services Treatment Center / Shelter.
- ⑧ I "Do" have Bipolar Mood Disorder, Anxiety, Obsessive Compulsive Disorder, Attention Deficit Hyperactivity Disorder, Multiple "Personalities" Disorder and Gender Identity Disorder as well as Post Traumatic Stress Disorder.
- ⑨ While at the Dodge Correctional Institution From Friday October 1, 2010 through Thursday March 10, 2011 Psychiatrist Dr. Shirley Dawson Diagnosed me with Bipolar Manic Depression Disorder MH-2 on ~~February~~^{January} 9, 2011.
- ⑩ Then on February 4, 2011 Dr. Dawson changed my Diagnosis to Bipolar Affective Disorder.
- ⑪ On February 11, 2011 Dr. Dawson changed my diagnosis and Mental Health Code from MH-2 to MH-1 and said I told her to do it just to send me to the Wisconsin Secure Program Facility on March 10, 2011.
- ⑫ My Clinical records and medical records also indicate that I have been prescribed Adderall, Concerta, Focalin, Mirtazaphine, Trazodone, Depakote, ~~Strattera~~, Strattera, Risperidone, Ritalin, Abilify, Chlorpromazine, Benadryl, Lexapro, and Prozac, I'm on Trazodone right now.
- ⑬ These medications treats ADHD, Anxiety, PTSD, Bipolar mood-swings, Dysomnia, Sleep problems, etc, etc,

- (14) I'm also prescribed Guafacine and Trazodone right now. Dr. Craig Schnoenecker Psychiatrist prescribed them for me.
- (15) While in the Community I was also taking estrogen medications, progestin creams, testosterone blockers, and Anti-androgen medications for 6 years.
- (16) I dressed as a female, wearing female clothes, and high heels, make up, lip-gloss and had my hair and nails done occasionally.
- (17) Since I been in the Wisconsin Department of Corrections - Adult Prison System, prison authorities will "NOT" let me continue my hormone therapy or have the Sex Change- Organ Change Surgical procedure and Facial Feminization, etc, etc.
- (18) I have a history of Gender Dysphoria- Gender Identity Disorder.
- (19) Dr. Tracy Johnson is a licensed Psychologist with the Wisconsin Department of Corrections at the Wisconsin Secure Program Facility Tuesdays and Thursdays. (20) She also works at the Fox Lake Correctional Institution Mondays and Wednesdays or Wednesdays and Fridays. (21) But she also rotates her Schedule.
- (22) She is the Psychology Services Unit Supervisor/manager
- (23) I have been working with her throughout her time here at WSPF as the Psychology Services Supervisor. (24) Which I believe she arrived at WSPF the month of April 2013. (25) And I've been under her care as she's the PSU Supervisor.

- (26) She Dr. Johnson told me in May 2013 that she will recommend the Coping Skills Program at the Wisconsin Resource Center.
- (27) I told her that I have problems coping and my mood changes like traffic lights, and I think I have Borderline Personality Disorder, Bipolar Mood Disorder, Post Traumatic Stress Disorder, and Gender Identity Disorder.
- (28) She Dr. Johnson agreed that she thinks I do have Borderline Personality Disorder, Anti-Social Personality Disorder with Narcissistic traits and Anger issues - Coping problems.
- (29) But she didn't say anything about me saying I have Gender Identity Disorder - Gender Dysphoria.
- (30) This is deliberate indifference and negligence because she was aware of my Gender Identity Crisis in 2013 and did nothing about it.
- (31) This has caused me Emotional Distress, Pain and Suffering and causes me to suffer immediate and irreparable psychological/mental distress.
- (32) From August of 2013 until January 29, 2015 my Psychologist/Therapist/Clinician was Dr. Torria VanBuren a licensed Psychologist.
- (33) Dr. VanBuren was very professional in regards to her psychotherapy treatment with me.
- (34) We had a good Doctor-patient relationship.
- (35) I never had a problem with her while she was my licensed Psychologist.
- (36) ~~that~~ I went to the Wisconsin Resource Center

Under her care.

(37) She was/is^a really good Psychologist.

(38) And on April 16, 2014 She helped me get a state owned television through PSU and Security by typing up a "Television Proposal for Gullet, Dominique (#528853)". This proposal was signed by Dr. VanBuren, Dr. Johnson, Warden Gary A. Boughton, Then Security Director Jerome A. Sweeney, then Capt. Sara Ann Mason and myself.

(39) However, when I told Dr. VanBuren I want to be a female and always have wanted to be a female since I was eight yearsold Dr. VanBuren didn't recommend through Kevin Kallas that I be evaluated for Gender Dysphria / Gender Identity Disorder.

(40) It took me to keep writing PSU about me having Gender Identity Disorder and Health Services asking who the G.I.D / G.D. Specialist is.

(41) Then, I believe Dr. Johnson finally sent an E-mail to Dr. Kevin Kallas, Bureau of Health Services - mental Health Director, letting him know that I'm saying I have Gender Dysphria and wants to be evaluated.

(42) Kevin Kallas ordered PSU Dr. Stacey Hoern to evaluate me for Gender Identity Dysphria.

(43) Dr. Hoern sent the case to Mr. Baron Crespo a license Professional Counselor and a Master of Science Psychologist.

(44) Mr. Baron Crespo, whom I've been working with since about May 13, 2015, conducted my Gender Dysphria Identity Disorder Screening evaluation on

July 8, 2015. (45) Mr. Crespo met with me in the PSU Visiting Booth at 8:00 A.M. and asked me numerous questions regarding Gender Identity and Gender Dysphoria.

(46) When I was done he told me that he'll then be writing up a report in regards to my evaluation.

(47) On August 11, 2015, Mr. Crespo met with me in the PSU Visiting booth on Charlie GP because I was having a bad day and was about to go on clinical observation for self-harm - cutting my arms and wrists.

(48) During our interview he informed me that he's finishing his report on my Gender Dysphoria Evaluation and that he recommended that I do see the Gender Dysphoria Specialist Cynthia S. Osbourne.

(49) Due to me having Attention Deficit Hyper-Activity Disorder, Post-traumatic Stress Disorder, Bipolar Mood Disorder and Gender Identity Disorder, I'm suffering from suicidal thoughts, wanting to kill myself, wanting to be a female, and having these different mood swings, etc, etc. is causing me extreme emotional distress, pain and suffering and psychological and mental distress.

(50) Gary Boughton is the Warden, and Troy Hermans is the Deputy Warden and I have written to the Warden's office several times since 2013 requesting a transfer to another prison mainly the Racine Correctional Institution or the Ashkosh

Correctional Institution, and they denied my requests.

(51) Due to me wanting to be a female I will fit in more at RCI or OSCI because its plenty of LGBT inmates at Racine Correctional Institution and Oshkosh Correctional Institution. And some of them are trans-sexual and are taking hormone therapy treatments and estrogen medications, etc, etc.

(52) I would like to have the Sex Change - Organ Change Surgical operation.

(53) I want my penis and balls cut off Surgically removed.

(54) I want breast implants and hair extensions etc etc, Cosmetics and make-up items, bras, panties etc.

(55) The Wisconsin Department of Corrections should let me have Sex Change Surgery and help me pay for the Surgery.

(56) I want the Doc to let me start my hormonal therapy treatments and prescribe me Estrogen medications and all the other medications I need.

(57) Capt. David Gardner, is a Supervising Officer 2, and serves as the Administrative Captain and sits on the Classification Committee along with Offender Classification Specialist Catherine Morrison and either Ms. Melanie Harper, Tania L. Clark, Lori Dickman, or Todd Evers.

(58) Capt. Gardner and Ms. Morrison denied my Social Workers and my recommendation for transfer.

(59) This has been going on since 2013.

(60) Due to serious mental health needs and Gender Identity Crisis I need to be at the Oshkosh Correctional Institution and or the Racine Correctional Institution

(61) Holding me here at the Wisconsin Secure Program Facility is Cruel and Unusual punishment, torture and Deliberate Indifference.

(62) I'm being denied adequate mental health treatment for "my" mental health concerns and problems.

(63) And both Psychology Services and Health Services are ~~inflicting~~ intentionally inflicting ~~me~~ Cruel and Unusual punishment, torture, emotional distress and pain and Suffering.

(64) Each defendant are discriminating me, torturing me, being deliberate indifferent, and this is a hate crime and Cruel and Unusual punishment which all violates my Eighth Amendment rights and my Americans with Disabilities and Rehabilitation Act.

(65) I constantly have Flashbacks - recalling the past ~~of~~ of me being Sexually Abused, Sexually molested, locked in closets, being physically and emotionally abused.

(66) Witnessing/seeing my relatives Shot and Killed in a drive by Shooting on the Northwest Side of Milwaukee.

(67) I do get goose bumps, chills and a fast and pounding heart beat when I'm reminded of the events.

(68) I have difficulty and trouble spending time with friends and other inmates and lose interest in doing some enjoyable things. (69) I easily get stressed and hurt emotionally.

(70) I know that the longer I stay here at the Wisconsin Secure Program Facility, and the longer I be denied hormone therapy treatment, and estrogen medications, progestin creams, testosterone blockers and anti-androgen medications, I will end up killing myself.

(71) I have also exhausted All my informal and outside Administrative remedies.

(72) Including filing offender complaints in which ICRS-ICE Staff deliberately misplaced my complaints or sent them back to me stating multiple issues.

(73) I have wrote to every defendant in this proposed lawsuit - Civil Rights Action Complaint and the defendants continue to fail to acknowledge my mental health needs, hormone therapy needs, estrogen medications needs and fails to acknowledge that I need to be at another institution.

(74) Mainly a medium or minimum institution where I know I'll be safe and sound and get the things I need, e.g. R.C.I., OSCI, or Oakhill ~~Correctional~~ Correctional Institution.

(75) I want my case to be handled by this court or the USED in Milwaukee, due to conflict of interest with the USWD in Madison —

I don't want them handling my case.

(76) I demand jury demand

(77) I seek monetary damages and compensatory damages in the amount of \$ 250,500.00 and \$150,000.00 For Cruel and Unusual Punishment, torture, deliberate indifference, discrimination, hate crime, inadequate mental health and medical health care treatment, Emotional distress, intentional infliction of emotional distress, pain and suffering and torture, 4 years and 6 months worth of torture, Cruel and Unusual punishment deliberate indifference, inadequate mental health treatment, etc, etc. in violation of my Eighth Amendment rights, First Amendment, thirteenth Amendment, and Fourteenth Amendment rights, and My Americans With Disabilities and Rehabilitation Act.

Dated this 19th day of August 2015

Sincerely and Respectfully Submitted
By: (Dominique Gulley A/K/A
Teriyaki Ariana Daniels Wilds
Plaintiff/Pro Se litigant

M/S. Teriyaki Ariana Daniels-Wilds A/K/A
M.B. Dominique DelWayne Miguel Gulley -
Fernandez Doc # 528853